

# BORRELLI & ASSOCIATES

**MEMO ENDORSED**

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February 6, 2020

Via ECF

The Honorable Valerie E. Caproni  
United States District Judge for the  
Southern District of New York  
40 Foley Square  
New York, New York 10007

USDC SDNY  
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Re: Ruiz v. Keratinbar Inc., et al; Case No. 17-cv-02216 (VEC)

Dear Judge Caproni:

This firm represents Plaintiff Angel Ruiz in the above-referenced employment discrimination matter against Defendants Keratinbar Inc. and 1976 Haircare Inc. We write to respectfully request, with Defendants' consent, one final extension of time for the parties to file their Joint Pre-Trial Order ("JPTO"), which is currently due on Monday, February 10, 2020, until Friday, February 21, 2020..

We are requesting an extension to file the JPTO so that the parties can focus their efforts on reaching an amicable resolution. With the assistance of Rebecca Price, Esq., the mediator assigned to this case, the parties continue, in earnest, to make significant progress in bridging the gap between their respective demands and offers. In fact, at least one of the parties has spoken with Ms. Price on each business day since January 30, 2020, the date the parties submitted their second joint request for an extension to file the JPTO. In addition, while the parties are currently collaborating on the JPTO in preparation for trial, in order to avoid the significant time and costs that the parties will expend to further prepare for and conduct a trial, and to preserve judicial resources, the parties respectfully request additional time to complete the JPTO so that they can continue to engage in hopefully fruitful settlement negotiations.

There is a pre-trial conference scheduled for Monday, February 24, 2020. Hopefully granting this extension will not deprive the Court of enough time to review the pre-trial submissions before that conference, but if it would, the parties respectfully request a brief adjournment of the conference to later in the same week, such as February 27 or 28, subject of course to the Court's availability.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



William K. Oates, Esq.

*For the Firm*

C: All Parties (*via ECF*)

Application GRANTED. Trial is adjourned to **March 31, 2020, at 10:00 a.m.** The FPTC is adjourned to **March 23, 2020, at 2:00 p.m.** The Parties' JPTO is due no later than **February 25, 2020**.

SO ORDERED.



2/6/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE